

# **EXHIBIT 1(A)**

## SCOPE

This Privacy Policy (“Policy”) describes how WinRed Technical Services, LLC’s (“TS,” “we,” or “us”) treats personal information on our websites and platforms where the Policy is located (the “Platform”).

This Platform facilitates your ability to make contributions to various political committees and campaigns. The pages on our Platform may be created by individuals or groups (“page creators”), political committees or campaigns. By using this Platform, you acknowledge and agree that when you use this Platform, TS does not control how these page creators, political committees and campaigns use or share your information.

This Platform is intended for use by individuals who are eighteen (18) years of age or older and are located in the United States.

## TYPES OF INFORMATION WE COLLECT

TS collects information from you and about you. Here are some examples of the information we may collect:

Contact Information. For example, we may collect your name, mailing address, telephone number and email address. We may also collect your mobile phone number.

Political Affiliation Information. For example, we may collect information about your political party affiliation and opinions and candidates or political issues that interest you.

Voter Registration Information. We may collect information about the jurisdiction where you are registered to vote, whether you are currently registered to vote, and what polling locations you use. We may also collect information about when you last voted, whether you participated in early voting and whether you submit votes through absentee ballots.

Contribution Information. For example, we may collect information about the amount of contributions you make and the candidates you support. We may publically post on our Platform your first name, your city and state, the amount of your donation and the candidate you support.

Payment Information. For example, we may collect your billing address and payment card type and expiration date.

Account Information. If you create an account on our Platform, we may collect your username and password.

Information You Post. We may collect information you post in a public space on our Platform, such as when you post a design or logo for a candidate in connection with a promotion.

Social Media Information. We may collect information you post on candidate, political committee, or campaign social media pages. We may also collect your social media profile information and information posted on your page. You may also choose to link your social media account with an account you create on our Platform.

Employment Information. For example, we may collect information about your employment status, employer and occupation. We may also ask whether you are retired.

**Information You Submit.** We may collect information when you send us a message through the “Contact Us” page or similar features on our Platform. We may also collect information when you enter a promotion. This may include photos, videos and other user-generated content that you submit. Some political committees or campaigns that use our Platform may ask you to submit other types of miscellaneous information. This may include various petitions, forms, and surveys.

**Demographic Information.** We may collect your birthdate, age, gender and zip code. We may also collect information that could identify you and relates to your hobbies, interests and political affiliation.

**Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your device identifier, IP address, or operating system.

**Other Information.** In addition, if you use our Platform, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.

## HOW WE COLLECT YOUR INFORMATION

TS collects your information in different ways. Below are some examples of how we may collect your information.

**Directly From You.** For example, when you:

Register for an account.

Make a contribution.

Make a purchase through an online store on our Platform (all purchases made through an online store are considered to be contributions).

Sign up to receive promotional communications.

Sign up for a candidate’s, political committee’s or campaign’s newsletter.

Participate in one of our promotional sweepstakes, contests, surveys, or focus groups.

Submit a design or logo for a candidate or campaign.

Submit a review or vote on candidate or campaign design or logo.

Submit a request to our customer service team.

Interact with TS, candidate, campaign or political committee social media pages.

**Passively.** For example, we may passively collect information when you visit and navigate our Platform on any device. We may also collect information about users over time and across different websites and devices when you use the Platform. Third parties also collect personal information this way on our Platform.

**From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from:

Our business partners. This may include Data Trust or similar organizations, our online advertising networks, analytics vendors, companies that co-sponsor our promotions, and political committees, campaigns or other political contribution sites.

Social media sites, including Facebook, Twitter, YouTube, Pinterest, Snapchat and Instagram.

Third-party sites, including those that allow you to integrate your third-party account with your TS account.

By Combining Information. For example, we may:

Combine information that we collect offline with information we collect through our Platform.

Combine information we collect about you from the different devices you use to access our Platform.

Combine information we get from third parties with information we already have about you.

## HOW WE USE YOUR INFORMATION

Examples of how we may use your information include:

To Improve Voter Modeling or Scoring. We, or our business partners or service providers, may use your information to improve the effectiveness of delivering political communications and to create better voting profiles.

To Provide Our Platform and Services. This could include facilitating and processing your contributions or other transactions.

To Provide Political Communications. We, political committees or campaigns, or page creators that use our Platform, or other third parties may contact you about your contribution, or the candidate, political committee or campaign to whom you contributed or other candidates, campaigns or issues that may be of interest to you.

To Improve Our Products and Services. We may use your information to make our Platform, products and services better. We may also use your information to customize your experience with us.

To Understand Your Interests. For example, we may use your information to better understand what campaigns, candidates, issues or products interest you.

To Respond to Your Requests or Questions. This may include responding to your feedback or notifying you if you win a promotion.

To Communicate With You. We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions. Page creators, political committees or campaigns that use our Platform may also contact you. For Marketing Purposes. We might use your information to serve you ads about specific candidates or remind you to make or complete a contribution. We might tell you about new features or updates. We, our partners, or page creators, political committees or campaigns, may also use your information to send you electronic communications, including through email or text message. This may include reminders if you visit the Platform, but do not make a contribution. We and our partners may engage in interest-based advertising using information gathered across multiple websites, devices, or other platforms. For more information about your choices related to these communications, see the Choices section below.

For Security Purposes. This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.

As Otherwise Permitted By Law or As We May Notify You.

## HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

Internally. We may share your information within TS and with our parent companies and subsidiaries, and they may use and share your information as described in this Policy.

**On Our Platform.** For example, we may display information about your contributions. This may include your name and city along with the amount contributed and candidate. We may also display information, including user-generated content, that you submit in connection with a promotion.

**With Page Creators, Political Committees and Campaigns.** TS facilitates contributions to various political committees and campaigns through pages that are created by page creators, political committees or campaigns. As part of our service to page creators, political committees and campaigns, they receive any information collected about their contributors or other contributors through the Platform. Page creators, political committees and campaigns may use your information for all of the purposes described in this Policy. Page creators, political committees and campaigns may also share, sell, lease, rent or exchange your information with other political committees, campaigns or other third parties. Page creators, political committees, campaigns, or third parties that receive your information from page creators, political committees or campaigns, may send you political communications or other marketing communications, and may use your information for purposes including the promotion of the Republican Party.

**With Our Business Partners.** For example, we may share your information with Data Trust or a similar business partner, and your information may be used for purposes including voter identification and advocacy initiatives. Such business partners may also share your information with third parties, including political committees and campaigns, for these purposes. We may also share your information with a third party that co-sponsors a contest or promotion. We may also share information with data aggregators, advertisers, media buying agencies, advertising networks, analytics providers, and advertising service providers.

**With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include merchandise vendors and payment processors. It may also include companies that send communications on our behalf or help us run our Platform.

**With Third Parties for Marketing Purposes.** This may include political committees or campaigns of candidates that may be of interest to you. These third parties may also share your information with others. These third parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.

**With Any Successors to All or Part of Our Business.** For example, if TS merges with, acquires or is acquired, or sells part of its business to another business entity. This may include an asset sale, corporate reorganization or other change of control.

**To Comply With Campaign Finance Laws.** Campaign finance law may require the submission of your name, address, occupation, and employer information along with details of your contribution to the recipient of your contribution and the reporting of this information to the Federal Election Commission (“FEC”) or relevant state or local election authority. Each political committee or campaign receiving your contributions may also include this information in their regulatory reports. FEC reports containing this information are publicly available from the FEC website.

To Comply With Other Laws or To Protect Ourselves. For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud. This could include fraud we think has occurred during a sweepstakes or promotion. We may also share information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.

For Other Reasons We May Describe to You.

#### CHILDREN UNDER 18

The Platform where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18, and we strive to comply with the provisions of COPPA (The Children's Online Privacy Protection Act). If you are a parent or legal guardian and think your child under 13 has provided us with information, please submit a request via our online webform. Parents, you can learn more about how to protect children's privacy on-line here.

#### CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information. Certain choices you make are browser and device specific.

Marketing Communications:

You can opt out of receiving our marketing communications by following the instructions included with the communication. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries.

Communications from Political Committees, Campaigns and Other Third Parties:

You may have the opportunity to sign-up to receive communications from page creators, political committees, campaigns and other third parties. If you wish to opt out of receiving marketing communications from any third party, please contact that third party directly to do so. Please note that "opt-out" and "unsubscribe" requests may not take effect immediately and may take a reasonable amount of time to process.

Cookies & Other Tracking Activities:

For information on our use of tracking technologies, and your ability to control these technologies, or to read our "Do Not Track" policy, please visit our About Ads policy at <https://winred.com/about-our-ads/>.

#### CALIFORNIA PRIVACY NOTICE

The California Consumer Privacy Act (“CCPA”) requires us to make specific disclosures about how we collect, use and share the “personal information” of California residents who are subject to CCPA. CCPA also grants such California residents certain rights related to such personal information. This section outlines these disclosures and instructions for California residents who wish to exercise their rights under CCPA. As with the other disclosures in this Policy, these descriptions only apply to how TS treats your personal information. Please directly contact page creators, political committees and/or campaigns with any questions you may have about their compliance with CCPA.

CCPA defines “personal information” as including particular categories of information. We are required under CCPA to tell you which categories of “personal information” we collect and which categories of personal information we disclose for “business purposes” or for “sale” purposes as these terms are defined under CCPA.

In the past 12 months, we have collected the following categories of personal information from California residents (“California Personal Information”): identifiers; categories of personal information described in subdivision (e) of Section 1798.80, including physical characteristics or description; characteristics of protected classifications under California or federal law; commercial information; internet or other electronic network activity information; visual information; professional or employment-related information; education information; and inferences drawn from the categories in this paragraph.

We want to explain that “sale” has a very broad definition under CCPA, and includes the sharing of “personal information” with a third party for “meaningful consideration.” CCPA is a new law and it is not clear what “meaningful consideration” is and what sharing practices may be a “sale” under CCPA. Therefore, out of an abundance of caution, we are including this “sale” disclosure and “Do Not Sell My Personal Information” opt-outs to account for activities including sharing personal information with DataTrust as described in the “How We Share Your Information” section and exchanging information with media and advertising companies through our use of cookies and our online advertising practices.

In the past 12 months, we may have “sold” (as this term is defined in CCPA) the following categories of “personal information” from California residents to third parties: identifiers; categories of personal information described in subdivision (e) of Section 1798.80, including physical characteristics or description; characteristics of protected classifications under California or federal law; commercial information; internet or other electronic network activity information; visual information; professional or employment-related information; education information; and inferences drawn from the categories in this paragraph.

We may disclose any of the above categories of California Personal Information for “business purposes” as this term is defined in CCPA.

We collect California Personal Information as described in the “HOW WE COLLECT YOUR INFORMATION” section of this Policy

We use the California Personal Information we collect for “business purposes” and “commercial purposes” as these terms are defined in CCPA. These purposes are as described in the “HOW WE USE YOUR INFORMATION” section of this Policy.

We share California Personal Information we collect with third parties as described in the “HOW WE SHARE YOUR INFORMATION” section of this Policy.

California resident rights under CCPA. Subject to certain exclusions included in CCPA, and as relevant to our operations, California residents have the rights listed below. We may take steps to verify your identity, as permitted or required under CCPA, before we process your request. Verification may include asking you to provide information about yourself that we can match against information already in our possession.

**Notice.** This means that you can request that we disclose the categories of “personal information” we have collected about you; the categories of sources from which such “personal information” is collected; the categories of “personal information” we have “sold” or disclosed for a business purpose; the categories of third parties to whom the “personal information” was “sold” or disclosed for a business purpose; and the specific pieces of “personal information” we have collected about you in the last 12 months.

**Deletion.** This means that you can request that we delete “personal information” about you which we have collected from you.

**Opt-Out.** This means you can request that we not “sell” “personal information” to third parties. If you would like to opt-out of allowing us to “sell” your “personal information,” please submit a request via our online webform.

**Equal prices and services.** This means that we are prohibited from discriminating against you if you exercise your rights under CCPA.

Agents that you have authorized to act on your behalf may also submit CCPA requests as instructed below. The agent must also provide evidence that they have your written permission to submit a request on your behalf. If we are unable to verify the authenticity of a request, we may ask you for more information or may deny the request.

California residents who wish to exercise their rights under this section can submit a request via our online webform.

**ADDITIONAL INFORMATION ABOUT YOUR CALIFORNIA PRIVACY RIGHTS:** If you reside in California, you have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please submit a request via our online webform.

## NEVADA PRIVACY NOTICE

If you are a Nevada resident, under Privacy and Security of Personal Information Chapter of the Nevada Revised Statutes Section 603A (“603A”), you have the right to submit a verified request to us, directing us not to make any sale of certain “personal information” as defined under this law that we have collected or will collect about you. As of the date of this Policy, we do not knowingly engage in the “sale” of “personal information” of Nevada residents. This statement is based on our understanding of how the term “sale” is defined under 603A as of the date of this Policy. However, Nevada residents who wish to exercise their rights under this section can submit a request via our online webform.

## SECURITY

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control. A user id and a password are needed to access certain areas of the TS Platform. It is your responsibility to protect your username and password.

#### STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the United States. This Platform is intended for use by individuals who are located in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country. If you are located outside of the United States, you understand and agree that we may transfer your personal information to the United States.

#### LINKS

Our Platform may contain links to other third party sites that are not governed by this Policy. If you click on a link to a third party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

#### HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at [winred.com/contact](http://winred.com/contact) or by telephone at 1 888-288-1890. You may also write to us at the following address:

WinRed Technical Services, LLC

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Suite 530  
Arlington, VA 22209

#### CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.